# *Detection and Avoidance of Counterfeit Electronic Parts—*
# *Further Implementation*

*Public Meeting*
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# TechAmerica & DIB Interests

- Represent companies in the DIB, IT and COMM Sectors
- Hardware manufacturers, integrators and operators
- Commercial as well as Public Sector companies
- Our members are on the leading edge of detection and avoidance of counterfeits

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# Goals

- Convey need for flexible systems, based on company-unique circumstances, to detect and avoid counterfeit parts
- Strict compliance unworkable and disruptive to the supply chain
- Need to avoid multiple interpretations of new standards
- Clarification on extent DCMA takes DIB's use of risk based analysis (RBA)
- Clarity around flow down issue  as it relates to non-CAS covered suppliers

# Questions Facing Industry

- When will guidance from DCMA on Contractor Purchasing System Reviews (CPSR) be forthcoming?
- Will Industry be able to offer input on this guidance?
- How will DCMA administer the requirements of this rule?
  - Through individual contracting officers?
  - Special Audits?

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# Questions Facing Industry

- Will DCMA train government personnel to a common standard?
- Will there be some backward looking review to ensure uniform application of this standard?

# Questions Facing Industry

- What are the requirements for traceability and authentication for parts already in inventory?
- Many parts are acquired in “pool buys,” not associated with a specific government contract, and commingled with other parts in inventory.
  - Will industry have to trace each of these parts?

# Questions Facing Industry

- If tracing each part in inventory is not possible, will Industry have to test each part individually?
- Or will Industry have to purge current inventory because of the costs to authenticate?